



RIGGS ASSET MANAGEMENT COMPANY, INC.
ADV PART 2A, BROCHURE

This brochure provides information about the qualifications and business practices of Riggs Asset Management Company, Inc. ("Riggs"). If you have any questions about the contents of this brochure, please contact us at (570)823-3383 or sshoemaker@riggsadvisors.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority.

Additional information about Riggs Asset Management Company, Inc. also is available on the SEC's web site at www.adviserinfo.sec.gov.

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Registration does not imply any level of skill or training.
March 16, 2020

Item 2 Material Changes

ANY QUESTIONS: Riggs Chief Compliance Officer, Susan Shoemaker. Remains available to address any questions regarding this Part 2A, including the disclosure additions and enhancements below.

Item 3 Table of Contents

Item 1	Cover Page	1
Item 2	Material Changes.....	2
Item 3	Table of Contents	3
Item 4	Advisory Business	4
Item 5	Fees and Compensation.....	8
Item 6	Performance-Based Fees and Side-By-Side Management.....	10
Item 7	Types of Clients	11
Item 8	Methods of Analysis, Investment Strategies and Risk of Loss	12
Item 9	Disciplinary Information.....	14
Item 10	Other Financial Industry Activities and Affiliations	15
Item 11	Code of Ethics, Participation or Interest in Client Transactions and Personal Trading	16
Item 12	Brokerage Practices	17
Item 13	Review of Accounts	21
Item 14	Client Referrals and Other Compensation	22
Item 15	Custody	23
Item 16	Investment Discretion.....	24
Item 17	Voting Client Securities.....	25
Item 18	Financial Information	26

Item 4 Advisory Business

- A. Riggs Asset Management Company, Inc. (“Riggs”) is a corporation formed on November 27, 1990 in the Commonwealth of Pennsylvania. Riggs became registered as an Investment Adviser Firm in January 1991. Riggs is principally owned by Robert H. Graham and Elizabeth B. Graham. Robert J. Graham is Riggs’ Founder.
- B. As discussed below, Riggs offers to its clients (individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations, etc.) investment management services, and, to the extent specifically requested by the client, limited consultation services to its investment management clients on investment and non- investment related matters (**See** Limitations below). Any such consultation services, to the extent rendered, shall be rendered exclusively on an unsolicited basis. Riggs has a family office function for high net worth individuals and families. Riggs provides bill paying, bookkeeping and record keeping, assistance with budgeting and cash flow management. Pricing is on an individualized basis and is directly correlated to the service need of the client.
- C. Riggs shall provide investment advisory services specific to needs of each client. Prior to providing investment advisory services, an investment adviser representative will ascertain each client’s investment objective(s). Thereafter, Riggs shall allocate and/or recommend that the client allocate investment assets consistent with the designated investment objective(s). The client may, at any time, impose reasonable restrictions, in writing, on Riggs’ services.
- D. Riggs does not participate in a wrap fee program.
- E. As of December 31, 2019, Riggs had \$347 Million in assets under management on a discretionary basis and \$3.6 Million in assets under management on a non-discretionary basis or a total of approximately \$350 Million in assets under management.

MISCELLANEOUS

Limitations Consulting/Implementation Services: Riggs does not hold itself out as a financial planner, nor does it provide comprehensive financial planning services. To the extent specifically requested by a client (and depending on the nature of the issue presented), Riggs may provide limited financial planning and related consulting services regarding non-investment related matters, such as estate planning, tax planning, insurance, etc. Riggs does not serve as an attorney, accountant, or insurance agency, and no portion of our services should be construed as same. Accordingly, Riggs does not prepare estate planning documents, tax returns or sell insurance products. To the extent requested by a client, we may recommend the services of other professionals for certain non-investment implementation purpose (i.e. attorneys, accountants, insurance, etc.). You are under no obligation to engage the services of any such recommended professional. The client retains absolute discretion over all such implementation decisions and is free to accept or reject any recommendation that we make.

Please Note: If the client engages any unaffiliated recommended professional, and a dispute arises thereafter relative to such engagement, the client agrees to seek recourse exclusively from and against the engaged professional. At all times, the engaged licensed professional[s] (i.e. attorney, accountant, insurance agent, etc.), and **not** Riggs, shall be responsible for the quality and competency of the services provided. **Please Also Note:** It remains the client's responsibility to promptly notify Riggs if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising Riggs' previous recommendation and/or services.

Retirement Plan Rollovers – No Obligation / Potential for Conflict of Interest: A client or prospective client leaving an employer typically has four options regarding an existing retirement plan (and may engage in a combination of these options): (i) leave the money in the former employer's plan, if permitted, (ii) roll over the assets to the new employer's plan, if one is available and rollovers are permitted, (iii) roll over to an Individual Retirement Account ("IRA"), or (iv) cash out the account value (which could, depending upon the client's age, result in adverse tax consequences). If Riggs recommends that a client roll over their retirement plan assets into an account to be managed by Riggs, such a recommendation creates a conflict of interest if Riggs will earn a new (or increase its current) advisory fee as a result of the rollover. To the extent that Riggs recommends that clients roll over assets from their retirement plan to an IRA managed by Riggs, then Riggs represents that it and its investment adviser representatives are fiduciaries under the Employment Retirement Income Security Act of 1974 ("ERISA"), or the Internal Revenue Code, or both. **No client is under any obligation to rollover retirement plan assets to an account managed by Riggs. Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the potential for conflict of interest presented by such rollover recommendation.**

ERISA / IRC Fiduciary Acknowledgment: If the client is: (i) a retirement plan ("Plan") organized under ERISA; (ii) a participant or beneficiary of a Plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code, with authority to direct the investment of assets in his or her Plan account or to take a distribution; (iii) the beneficial owner of an IRA acting on behalf of the IRA; or (iv) a Retail Fiduciary with respect to a plan subject to Title I of ERISA or described in section 4975(e)(1)(A) of the Internal Revenue Code: then Riggs represents that it and its representatives are fiduciaries under ERISA or the Internal Revenue Code, or both, with respect to any investment advice provided by Riggs or its representatives or with respect to any investment recommendations regarding an ERISA Plan or participant or beneficiary account.

Tradeaway/Prime Broker Fees: As discussed below at Item 5, relative to its discretionary investment management services, when beneficial to the client, individual fixed income transactions may be often be effected through broker-dealers other than the account custodian, in which event, the client generally will incur the fee (commission, mark-up/mark-down) charged by the executing broker-dealer and, potentially, a separate "tradeaway" and/or prime broker fee charged by the account custodian (generally Schwab or TD Ameritrade).

Cash Positions: At any specific point in time, depending upon perceived or anticipated market conditions/events (there being **no guarantee** that such anticipated market conditions/events will occur), Riggs may maintain cash positions for defensive purposes. All cash positions (money markets, etc.) shall be included as part of assets under management for purposes of calculating Riggs' advisory fee. **Riggs's Chief Compliance Officer, Susan A. Shoemaker remains available to address any questions that a client or prospective may have regarding the above fee billing practice.**

Portfolio Activity: Riggs has a fiduciary duty to provide services consistent with the client's best interest. As part of its investment advisory services, Riggs will review client portfolios on an ongoing basis to determine if any changes are necessary based upon various factors, including, but not limited to, investment performance, market conditions, fund manager tenure, style drift, account additions/withdrawals, and/or a change in the client's investment objective. Based upon these factors, there may be extended periods of time when Riggs determines that changes to a client's portfolio are neither necessary nor prudent. Clients remain subject to the fees described in Item 5 below during periods of account inactivity. Of course, as indicated below, there can be no assurance that investment decisions made by Riggs will be profitable or equal any specific performance level(s).

Custodian Charges-Additional Fees: As discussed below at Item 12 below, when requested to recommend a broker-dealer/custodian for client accounts, Riggs generally recommends that Schwab and/or TD Ameritrade serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as Schwab and TD Ameritrade can (depending upon the type of transaction) charge transaction fees for effecting certain securities transactions. Starting October 2, 2019 for Schwab and October 3, 2019 for TD Ameritrade trade commissions were eliminated for most equity and ETF transactions, however, some fees still remain for certain types of transactions. Prior to those dates, in addition to Riggs' investment advisory fee referenced in Item 5 below, the client also incurred transaction fees to purchase securities for the client's account. **ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker remains available to address any questions that a client or prospective client may have regarding the above.**

Trustee Directed Plans: Riggs may be engaged to provide discretionary investment advisory services to ERISA retirement plans, whereby the Firm shall manage Plan assets consistent with the investment objective designated by the Plan trustees. In such engagements, Riggs will serve as an investment fiduciary as that term is defined under The Employee Retirement Income Security Act of 1974 ("ERISA"). Riggs will generally provide services on an "assets under management" fee basis per the terms and conditions of an *Investment Advisory Agreement* with the Plan.

Client Obligations: In performing our services, Riggs shall not be required to verify any information received from the client or from the client's other professionals, and is expressly authorized to rely thereon. Moreover, each client is advised that it remains the client's responsibility to promptly notify us if there is ever any change in the client's financial situation or investment objectives for the purpose of reviewing, evaluating, or revising our previous recommendations and/or services.

Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Riggs) will be profitable or equal any specific performance level(s).

Disclosure Brochure: A copy of Riggs' written Brochure as set forth on Part 2 of Form ADV shall be provided to each client prior to, or contemporaneously with, the execution of the *Investment Advisory Agreement*.

Item 5 Fees and Compensation

- A. The client can determine to engage Riggs to provide discretionary investment advisory services on a *fee-only* basis.

INVESTMENT MANAGEMENT SERVICES

In the event the client determines to engage Riggs to provide discretionary management services on a *fee-only* basis, Riggs shall charge an annual investment management fee based upon a percentage of the market value of the assets being managed by Riggs as follows:

ASSETS	ANNUAL FEE
First \$5,000,000	1.0%
Next \$5,000,000	0.85%
Next \$5,000,000	0.75%

Above \$15,000,000 fee is negotiable:

Riggs' annual investment advisory fee shall include investment advisory services, and, to the extent specifically requested by the client, limited consultation services to its investment management clients on investment and non-investment related matters. Any such consultation services, to the extent rendered, shall be rendered exclusively on an unsolicited basis.

Riggs may also render investment advice through consultations, reviews, or studies not involving investment management services, for which Riggs shall generally bill the client at the hourly rate of \$300.00.

Riggs may offer the services related to running a family office for which it contracts a fixed charge related to the services provided.

- B. Clients may elect to have Riggs' management fees deducted from their custodial account. Both Riggs' *Investment Advisory Agreement* and the custodial/clearing agreement may authorize the custodian to debit the account for the amount of Riggs' investment management fee and to directly remit that management fee to Riggs in compliance with regulatory procedures. In the limited event that Riggs bills the client directly, payment is due upon receipt of Riggs' invoice. Riggs shall deduct fees and/or bill clients quarterly in advance, based upon the market value of the assets on the last business day of the previous quarter.
- C. As discussed below, unless the client directs otherwise or an individual client's circumstances require, Riggs shall generally recommend that Charles Schwab and Co., Inc. ("*Schwab*") or TD Ameritrade ("*TD Ameritrade*") serve as the broker-dealer/custodian for client investment management assets. Broker-dealers such as *Schwab* and *TD Ameritrade* can charge brokerage commissions and/or transaction fees for effecting certain securities transactions. Clients will incur, in addition to Riggs' investment management fee, brokerage commissions and/or transaction fees, and, relative to all mutual fund and exchange traded fund purchases, charges imposed at the fund level (e.g. management fees and other fund expenses). Starting October 2, 2019 for Schwab and October 3, 2019

for TD Ameritrade trade commissions for most equity and ETF transactions were eliminated, however, some fees still remain for certain types of transactions. In the alternative, transactions may be cleared through other broker-dealers (for example: Citigroup, JP Morgan, Morgan Stanley/Smith Barney) with whom *Schwab* and/or *TD Ameritrade* and Riggs have entered into agreements for prime brokerage clearing services. The use of prime brokerage services to place transactions through other broker-dealers allows Riggs the opportunity for broader access to the securities markets, and the potential for more favorable pricing and/or or execution. In addition to the commission and/or transaction fee charged by the clearing broker-dealer, *Schwab* and/or *TD Ameritrade* charge an administrative processing fee for prime brokerage transactions- **see** Tradeaway/Prime Broker Fees above. Clients may elect not to use prime brokerage services. In that event, securities transactions for that client will be restricted to *Schwab* and/or *TD Ameritrade*.

- D. Riggs' annual investment advisory fee shall be prorated and paid quarterly, in advance, based upon the market value of the assets on the last business day of the previous quarter. There shall be no fee adjustments for intra-quarter asset additions or withdrawals. Riggs, in its sole discretion, may charge a lesser investment management fee, charge a fixed fee, or charge no fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, grandfathered fee schedules, employee/family accounts, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding advisory fees.

The *Investment Advisory Agreement* between Riggs and the client will continue in effect until terminated by either party by written notice in accordance with the terms of the *Investment Advisory Agreement*. Upon termination, Riggs shall refund the pro-rated portion of the advanced advisory fee paid based upon the number of days remaining in the billing quarter.

- E. Neither Riggs, nor its representatives accept compensation from the sale of securities or other investment products.

Item 6 Performance-Based Fees and Side-By-Side Management

Neither Riggs nor any supervised person of Riggs accepts performance-based fees.

Item 7 Types of Clients

Riggs' clients shall generally include individuals, business entities, pension and profit sharing plans, trusts, estates and charitable organizations. Riggs, in its sole discretion, may charge a lesser investment management fee, charge a fixed fee, or charge no fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, grandfathered fee schedules, employee/family accounts, courtesy accounts, competition, negotiations with client, etc.). **Please Note:** As result of the above, similarly situated clients could pay different fees. In addition, similar advisory services may be available from other investment advisers for similar or lower fees. **ANY QUESTIONS:** Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding advisory fees.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

A. Riggs may utilize the following methods of security analysis:

- Charting - (analysis performed using patterns to identify current trends and trend reversals to forecast the direction of prices)
- Fundamental - (analysis performed on historical and present data, with the goal of making financial forecasts)
- Technical – (analysis performed on historical and present data, focusing on price and trade volume, to forecast the direction of prices)
- Cyclical – (analysis performed on historical relationships between price and market trends, to forecast the direction of prices)

Riggs may utilize the following investment strategies when implementing investment advice given to clients:

- Long Term Purchases (securities held at least a year)
- Short Term Purchases (securities sold within a year)
- Trading (securities sold within thirty (30) days)

Please Note: Investment Risk: Different types of investments involve varying degrees of risk, and it should not be assumed that future performance of any specific investment or investment strategy (including the investments and/or investment strategies recommended or undertaken by Riggs) will be profitable or equal any specific performance level(s).

B. Riggs' methods of analysis and investment strategies do not present any significant or unusual risks.

However, every method of analysis has its own inherent risks. To perform an accurate market analysis Riggs must have access to current/new market information. Riggs has no control over the dissemination rate of market information; therefore, unbeknownst to Riggs, certain analyses may be compiled with outdated market information, severely limiting the value of Riggs' analysis. Furthermore, an accurate market analysis can only produce a forecast of the direction of market values. There can be no assurances that a forecasted change in market value will materialize into actionable and/or profitable investment opportunities.

Riggs' primary investment strategies - Long Term Purchases, Short Term Purchases, and Trading - are fundamental investment strategies. However, every investment strategy has its own inherent risks and limitations. For example, longer term investment strategies require a longer investment time period to allow for the strategy to potentially develop. Shorter term investment strategies require a shorter investment time period to potentially develop but, as a result of more frequent trading, may incur higher transactional costs when compared to a longer term investment strategy. Trading, an investment strategy that requires the purchase and sale of securities within a thirty (30) day investment time period involves a very short investment time period but will incur

higher transaction costs when compared to a short term investment strategy and substantially higher transaction costs than a longer term investment strategy.

- C. Currently, Riggs primarily allocates investment management assets of its client accounts among individual equity and debt securities, exchange traded funds and various no-load mutual fund classes, on a discretionary basis, in accordance with the investment objectives of the client.

Item 9 Disciplinary Information

Riggs has not been the subject of any disciplinary actions.

Item 10 Other Financial Industry Activities and Affiliations

- A. Neither Riggs, nor its representatives, are registered or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.
- B. Neither Riggs, nor its representatives, are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or a representative of the foregoing.
- C. Riggs has no other relationship or arrangement with a related person that is material to its advisory business.
- D. Riggs does not receive, directly or indirectly, compensation from investment advisors that it recommends or selects for its clients.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

- A. Riggs maintains an investment policy relative to personal securities transactions. This investment policy is part of Riggs' overall Code of Ethics, which serves to establish a standard of business conduct for all of Riggs' Representatives that is based upon fundamental principles of openness, integrity, honesty and trust, a copy of which is available upon request.

In accordance with Section 204A of the Investment Advisers Act of 1940, Riggs also maintains and enforces written policies reasonably designed to prevent the misuse of material non-public information by Riggs or any person associated with Riggs.

- B. Neither Riggs nor any related person of Riggs recommends, buys, or sells for clients' accounts, securities in which Riggs or any related person of Riggs has a material financial interest.
- C. Riggs and/or representatives of Riggs can buy or sell securities that are also recommended to clients. This practice may create a situation where Riggs and/or representatives of Riggs are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. Practices such as "scalping" (i.e., a practice whereby the owner of shares of a security recommends that security for investment and then immediately sells it at a profit upon the rise in the market price which follows the recommendation) could take place if Riggs did not have adequate policies in place to detect such activities. In addition, this requirement can help detect insider trading, "front-running" (i.e., personal trades executed prior to those of Riggs' clients) and other potentially abusive practices.

Riggs has a personal securities transaction policy in place to monitor the personal securities transactions and securities holdings of each of Riggs' "Access Persons." Riggs' securities transaction policy requires that an Access Person of Riggs must provide the Chief Compliance Officer or his/her designee with a written report of their current securities holdings within ten (10) days after becoming an Access Person. Additionally, each Access Person must provide the Chief Compliance Officer or his/her designee with a written report of the Access Person's current securities holdings at least once each twelve (12) month period thereafter on a date Riggs selects; provided, however that at any time that Riggs has only one Access Person, he or she shall not be required to submit any securities report described above.

- D. Riggs and/or representatives of Riggs can buy or sell securities, at or around the same time as those securities are recommended to clients. This practice creates a situation where Riggs and/or representatives of Riggs are in a position to materially benefit from the sale or purchase of those securities. Therefore, this situation creates a potential conflict of interest. As indicated above in Item 11 C, Riggs has a personal securities transaction policy in place to monitor the personal securities transaction and securities holdings of each of Riggs' Access Persons.

Item 12 Brokerage Practices

- A. In the event that the client requests that Riggs recommend a broker-dealer/custodian for execution and/or custodial services (exclusive of those clients that may direct Riggs to use a specific broker-dealer/custodian), Riggs generally recommends that investment management accounts be maintained at *Schwab* and/or *TD Ameritrade*. Prior to engaging Riggs to provide investment management services, the client will be required to enter into a formal *Investment Advisory Agreement* with Riggs setting forth the terms and conditions under which Riggs shall manage the client's assets, and a separate custodial/clearing agreement with each designated broker-dealer/custodian.

Factors that Riggs considers in recommending *Schwab* and/or *TD Ameritrade* (or any other broker-dealer/custodian to clients) include historical relationship with Riggs, financial strength, reputation, execution capabilities, pricing, research, and service. Although the commissions and/or transaction fees paid by Riggs' clients shall comply with Riggs' duty to obtain best execution, a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Riggs determines, in good faith, that the commission/transaction fee is reasonable in relation to the value of the brokerage and research services received. In seeking best execution, the determinative factor is not the lowest possible cost, but whether the transaction represents the best qualitative execution, taking into consideration the full range of a broker-dealer service, including the value of research provided, execution capability, commission rates, and responsiveness. Accordingly, although Riggs will seek competitive rates, it may not necessarily obtain the lowest possible commission rates for client account transactions. The brokerage commissions or transaction fees charged by the designated broker-dealer/custodian are exclusive of, and in addition to, Riggs' investment management fee. AS of October 2nd and 3rd commission rates were eliminated for most equity and ETF transactions.

1. Schwab Advisor Services Program

Riggs participates in the *Schwab Advisor Services* program. *Schwab Advisor Services* is a division of *Charles Schwab & Company, Inc.*, a FINRA registered broker-dealer, member SIPC. Riggs may recommend that clients establish brokerage accounts with Schwab Advisor Services to maintain custody of clients' assets and to effect trades for their accounts. Although Riggs may recommend that clients establish accounts at Schwab, it is the client's decision to custody assets with Schwab. Riggs is independently owned and operated and not affiliated with Schwab. Riggs receives some benefits from Schwab through its participation in the program. **Please see** disclosure below.

TD Ameritrade Institutional Program

Riggs participates in the *TD Ameritrade Institutional* program. *TD Ameritrade Institutional* is a division of *TD Ameritrade Inc.*, member FINRA/SIPC. *TD Ameritrade* is an unaffiliated SEC-registered broker-dealer and FINRA member. *TD Ameritrade* offers to independent investment advisors services which include custody of securities, trade execution, and clearance and settlement of transactions. Riggs receives some benefits from *TD Ameritrade* through its participation in the program. **Please see** disclosure below.

Research and Additional Benefits

Soft Dollar Arrangement: Generally, in addition to a broker's ability to provide "best execution," we may also consider the value of "research" or additional brokerage products and services a broker-dealer has provided or may be willing to provide. This is known as paying for those services or products with "soft dollars." Riggs maintains soft dollar arrangements with both *Schwab* and *TD Ameritrade* to obtain research and/or other products that assist Riggs in its investment decision making process for its clients' accounts (*see* disclosure below regarding Ned Davis Research, Inc. and Dorsey Wright). Because many of the services or products could be considered to provide a benefit to Riggs, and because the "soft dollars" used to acquire them are generated from transaction fees on client assets, Riggs could be considered to have a **conflict of interest** in allocating client brokerage business: it could receive valuable benefits by selecting a particular broker or dealer to execute client transactions and the transaction compensation charged by that broker or dealer might not be the lowest compensation Riggs might otherwise be able to negotiate. In addition, Riggs could have an incentive to cause clients to engage in more securities transactions than would otherwise be optimal in order to generate brokerage compensation with which to acquire products and services.

Riggs' use of soft dollars is intended to comply with the requirements of Section 28(e) of the Securities Exchange Act of 1934. Section 28(e) provides a "safe harbor" for investment managers who use commissions or transaction fees paid by their advised accounts to obtain investment research services that provide lawful and appropriate assistance to the manager in performing investment decision-making responsibilities. As required by Section 28(e), Riggs will make a good faith determination that the amount of commission or other fees paid is reasonable in relation to the value of the brokerage and research services provided. That is, before placing orders with a particular broker, we generally determine, considering all factors described below, that the compensation to be paid to *Schwab* and/or *TD Ameritrade* is reasonable in relation to the value of all the brokerage and research products and services provided by *Schwab* and/or *TD Ameritrade*. In making this determination, we typically consider not only the particular transaction or transactions, and not only the value of brokerage and research services and products to a particular client, but also the value of those services and products in our performance of our overall responsibilities to all of our clients. In some cases, the commissions or other transaction fees charged by a particular broker-dealer for a particular transaction or set of transactions may be greater than the amounts another broker-dealer who did not provide research services or products might charge. As of October 2, 2019 for Schwab and October 3, 2019 for TD Ameritrade trade commissions on most equity and ETF transactions were eliminated, however, some fees still remain for certain types of transactions.

ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above soft dollar arrangements and the corresponding conflict of interest presented by such arrangements.

Non-Soft Dollar Benefits: Although not a material consideration when determining whether to recommend that a client utilize the services of a particular broker-dealer/custodian, Riggs can receive from Schwab (or another broker-dealer/custodian, platform sponsor, fund sponsor, or vendor) without cost (and/or at a discount) support services and/or products, certain of which assist Riggs to better monitor and service client accounts maintained at such institutions. Included within the support services that can be obtained by Riggs can be investment-related research, pricing information and market data, software and other technology that provide access to client account data, compliance and/or practice management-related publications, discounted or gratis consulting services, discounted and/or gratis attendance at conferences, meetings, and other educational and/or social events, marketing support-including client events, computer hardware and/or software and/or other products used by Riggs in furtherance of its investment advisory business operations.

Riggs' clients do not pay more for investment transactions effected and/or assets maintained at Schwab as the result of this arrangement. There is no corresponding commitment made by Riggs to Schwab, or any other any entity, to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as result of the above arrangement.

In addition, with regard to research obtained per soft dollar arrangements with Schwab and TD Ameritrade discussed above, Riggs has a relationship with both Ned Davis Research, Inc., ("*Davis*") and Dorsey Wright ("*Dorsey Wright*"). Both firms are independent investment research firms that provide daily and special reports of technical and quantitative data on the US debt and equity markets, the international markets and individual debt and equity securities. The cost of the service provided by *Davis* is approximately \$40,000 annually. The cost of *Dorsey Wright* is approximately \$2,000 - \$3,000 annually. Riggs pays for part of *Davis* by placing debt or equity transactions through *Schwab* and pays for part of *Dorsey Wright* by placing debt or equity transactions through *TD Ameritrade*. In this situation, in addition to providing execution and clearing services, all of or a portion of the commissions and/or transaction costs paid by the client to the broker-dealer are used to pay for *Davis* and/or *Dorsey Wright* research. The *Davis* and *Dorsey Wright* research generally will be used to service all of Riggs' clients, but because these research sources are partly paid for from commissions and/or transaction costs charged for debt or equity transactions, certain clients may not participate in payment for the research (i.e. clients investing only in no-load mutual funds) nor, because of differences in the type, size and frequency of debt or equity transactions, will clients participate equally in the payment for research. In addition, brokerage commissions paid by a specific client may be used to pay for research that is not used in managing that specific client's account.

Although the commissions paid by Riggs' clients to *Schwab* and/or *TD Ameritrade* for these research sources are extremely competitive (i.e., significant discount from full retail commission rates), a client may pay a commission that is higher than another qualified broker-dealer might charge to effect the same transaction where Riggs

determines, in good faith, that the commission is reasonable in relation to the value of the brokerage and research services received. The brokerage commissions and/or transaction fees charged by the broker-dealer/custodian are exclusive of, and in addition to, Riggs' investment management fee. As of October 2, 2019 for Schwab and October 3, 2019 for TD Ameritrade trade commissions on most equity and ETF transactions were eliminated, however, some fees still remain for certain types of transactions.

ANY QUESTIONS: Riggs' Chief Compliance Officer, Susan Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflict of interest presented by such arrangements.

2. Riggs does not receive referrals from broker-dealers.
 3. **Directed Brokerage:** Riggs recommends that its clients utilize the brokerage and custodial services provided by Schwab and/or TD Ameritrade. Riggs does not generally accept directed brokerage arrangements (when a client requires that account transactions be effected through a specific broker-dealer). In such client directed arrangements, the client will negotiate terms and arrangements for their account with that broker-dealer, and Riggs will not seek better execution services or prices from other broker-dealers or be able to "batch" the client's transactions for execution through other broker-dealers with orders for other accounts managed by Riggs. As a result, a client may pay higher commissions or other transaction costs or greater spreads, or receive less favorable net prices, on transactions for the account than would otherwise be the case. **Please Note:** In the event that the client directs Riggs to effect securities transactions for the client's accounts through a specific broker-dealer, the client correspondingly acknowledges that such direction may cause the accounts to incur higher commissions or transaction costs than the accounts would otherwise incur had the client determined to effect account transactions through alternative clearing arrangements that may be available through Riggs. Higher transaction costs adversely impact account performance. **Please Also Note:** Transactions for directed accounts will generally be executed following the execution of portfolio transactions for non-directed accounts.
- B. **Order Aggregation:** Transactions for each client account generally will be effected independently. To the extent applicable relative to exchange listed equity purchases, Riggs may determine to purchase or sell the same securities for several clients at approximately the same time. In such situations, Riggs may (but is not obligated to) combine or "bunch" such orders when it believes that it might result in obtaining better price execution.

Item 13 Review of Accounts

- A. For those clients to whom Riggs provides investment supervisory services, account reviews are conducted on an ongoing basis by Riggs' Principal, Robert H. Graham and/or representatives, Alan J Corey Glassman, Robert J. Graham, Elizabeth Graham, Susan A. Shoemaker and Robert Graham. All investment supervisory clients are advised that it remains their responsibility to advise Riggs of any changes in their investment objectives and/or financial situation. All clients (in person or via telephone) are encouraged to comprehensively review investment objectives and account performance with Riggs on an annual basis.
- B. Riggs can conduct account reviews on an other than periodic basis upon the occurrence of a triggering event, such as a change in client investment objectives and/or financial situation, market corrections and client request.
- C. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker-dealer/custodian for the client accounts. Those clients to whom Riggs provides investment supervisory services will also receive from Riggs a quarterly report summarizing account activity and performance.

Item 14 Client Referrals and Other Compensation

- A. As referenced in Item 12.1 above, Riggs maintains soft dollar arrangements with both *Schwab* and *TD Ameritrade*, and also receives a certain additional economic benefits from *Schwab* and/or *TD Ameritrade* pursuant to which, Riggs, without cost (and/or at a discount), may receive support services and/or products from *Schwab* and/or *TD Ameritrade*.

There is no corresponding commitment made by Riggs to *Schwab* and/or *TD Ameritrade* or any other any entity to invest any specific amount or percentage of client assets in any specific mutual funds, securities or other investment products as a result of the above arrangement.

Riggs' Chief Compliance Officer, Susan A. Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above arrangements and the corresponding conflicts of interest presented by such arrangements.

- B. If a client is introduced to Riggs by either an unaffiliated or an affiliated solicitor, Riggs shall generally pay that solicitor a referral fee in accordance with the requirements of Rule 206(4)-3 of the Investment Advisers Act of 1940, and any corresponding state securities law requirements. Any such referral fee shall be paid solely from Riggs' investment management fee, and shall not result in any additional charge to the client. If the client is introduced to Riggs by an unaffiliated solicitor, the solicitor, at the time of the solicitation, shall disclose the nature of the solicitor relationship, and shall provide each prospective client with a copy of Riggs' written Brochure with a copy of the written disclosure statement from the solicitor to the client disclosing the terms of the solicitation arrangement between Riggs and the solicitor, including the compensation to be received by the solicitor from Riggs.

Item 15 Custody

Riggs shall have the ability to have its advisory fee for each client debited by the custodian on a quarterly basis. Clients are provided with transaction confirmation notices and regular summary account statements directly from the broker- dealer/custodian for the client accounts. Those clients to whom Riggs provides investment supervisory services will also receive from Riggs a quarterly report summarizing account activity and performance.

Please Note: To the extent that Riggs provides clients with periodic account statements or reports, the client is urged to compare any statement or report provided by Riggs with the account statements received from the account custodian. The account custodian does not verify the accuracy of the Riggs' advisory fee calculation.

Please Also Note: Riggs engages in other practices and/or services on behalf of its clients that require disclosure at the Custody section of Part 1 of Form ADV, certain of which practices and/or services are subject to an annual surprise CPA examination in accordance with the requirements of Rule 206(4)-2 under the Investment Advisors Act of 1940. **Riggs' Chief Compliance Officer, Susan A. Shoemaker, remains available to address any questions that a client or prospective client may have regarding custody-related issues.**

Item 16 Investment Discretion

The client can determine to engage Riggs to provide investment advisory services on a discretionary basis. Prior to Riggs assuming discretionary authority over a client's account, the client shall be required to execute an *Investment Advisory Agreement*, naming Riggs as the client's attorney and agent in fact, granting Riggs full authority to buy, sell, or otherwise effect investment transactions involving the assets in the client's name or found in the discretionary account.

Clients who engage Riggs on a discretionary basis may, at any time, impose restrictions, **in writing**, on Riggs' discretionary authority. (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe Riggs' use of margin, etc.).

Item 17 Voting Client Securities

- A. Riggs does not vote client proxies. Clients maintain exclusive responsibility for: (1) directing the manner in which proxies solicited by issuers of securities beneficially owned by the client shall be voted, and (2) making all elections relative to any mergers, acquisitions, tender offers, bankruptcy proceedings or other type events pertaining to the client's investment assets.
- B. Clients will receive their proxies or other solicitations directly from their custodian. Clients may contact Riggs to discuss any questions they may have with a particular solicitation.

Item 18 Financial Information

- A. Riggs does not solicit fees of more than \$1,200, per client, six months or more in advance.
- B. Riggs is unaware of any financial condition that is reasonably likely to impair its ability to meet its contractual commitments relating to its discretionary authority over certain client accounts.
- C. Riggs has not been the subject of a bankruptcy petition.

Any questions: Riggs' Chief Compliance Officer, Susan A. Shoemaker, remains available to address any questions that a client or prospective client may have regarding the above disclosures and arrangements.